

### REMARKS

In the specification, the paragraph beginning on page 6 of the amended specification, line 14 has been amended to address the Examiner's objections regarding the "stop" and "latching/non-latching" features in the claims. Similarly, FIG. 3 was amended to incorporate the stop and latching discussed in the specification and claims. No new matter has been introduced as a result of these amendments. Withdrawal of the objections are respectfully requested.

Claims 13-25 are pending in the present application. Claims 13 and 21 were amended to clarify the recited language. Claim 14 was canceled, without prejudice. No new matter has been introduced.

Claims 13-18, and 20-21 were rejected under 35 U.S.C. §102(e) as being anticipated by *Pruchniak* (US Patent 6,075,518). Claim 19 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Pruchniak* (US Patent 6,075,518) in view of *Rosenberg* (US Patent No (6,128,006). Claims 22-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Pruchniak* (US Patent 6,075,518) in view of *Whitmore* (US Patent No (6,108,277). Claims 2-25 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Pruchniak* (US Patent 6,075,518) in view of *Iijima et al.* (US Patent No (6,359,668). Applicant traverses these rejections. Favorable reconsideration is respectfully requested.

Specifically, none of the cited art, alone or in combination, discloses "a second key function that is independent of the rotary functions, the second key function being triggered by a pressing function that is substantially perpendicular to a plane of the rotary movement" as recited in claim 13, and similarly in claim 21.

Regarding *Pruchniak*, the reference teaches that the rotating member 50 may be tilted along the axis of control arm 40 to actuate either of two switches (34) located in the housing (col. 3, lines 48-55; col. 4, line 58 - col. 5, line 5). In other words, *Pruchniak* teaches a rotating member that has a rotation that is perpendicular relative to the support arm, and a tilting that is parallel relative to the support arm (see col. 5, lines 51-59). However *Pruchniak* does not teach a pressing function that is perpendicular to a plane of the rotary movement. In fact, the configuration of the rotating member 50 being mounted through control arm 40, having a fulcrum point 22 in FIG. 1 clearly demonstrated that such motion is not possible. Accordingly, the Applicants respectfully submit that the rejection is improper and should be withdrawn.

For the same reasons give above, Applicants respectfully submit that the rejections under 35 U.S.C. §103 are also improper and should be withdrawn.

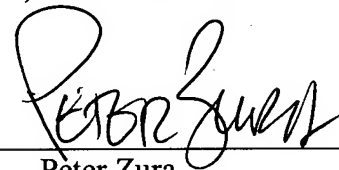
Furthermore, claim 21 recite features that are in means-plus-function format. The "broadest reasonable interpretation" that an examiner may give means-plus-function language is that statutorily mandated in paragraph six. 35 U.S.C. 112, sixth paragraph states that a claim limitation expressed in means-plus-function language "shall be construed to cover the corresponding structure described in the specification and equivalents thereof." Accordingly, the PTO may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination (see MPEP 2181).

In light of the above amendments and arguments, Applicant submits that the present claims are allowable over the prior art. Applicant also requests that a timely Notice of Allowance be issued in this case. Also, the Applicants have included a petition for a 3-month extension of time, along with a check in the amount of \$1020.00. Should there be any charges regarding this application, the Examiner is hereby authorized to charge Deposit Account 02-1818 for any insufficiency of payment.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY



Peter Zura

Reg. No. 48,196

P.O. Box 1135

Chicago, Illinois 60690-1135

Phone: (312) 807-4208

Dated: January 5, 2005

**Amendments to the Drawings:**

The attached sheet of drawings includes changes to FIG. 3. This sheet, which includes FIGs. 3-4, replaces the original sheet including FIGs. 3-4.

Attachment: Replacement sheet